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6 *SECURITY NATIONAL INSURANCE COMPANY*

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 WFTLV01, LLC, a Nevada limited liability  
company,

11 Plaintiff,

12 vs.

13 SECURITY NATIONAL INSURANCE  
14 COMPANY, a Delaware corporation

15 Defendant.  
16  
17

Case No. 2:20-cv-01845-JCM-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANT TO  
FILE REPLY TO PLAINTIFF'S  
OPPOSITION TO MOTION TO DISMISS  
AND TO EXCEED PAGE LIMITATION**

**[Second Request]**

18 IT IS STIPULATED by and between Plaintiff and Defendant, through their respective  
19 counsel, and pursuant to LR IA 6-1 and LR 7-1 to LR 7-3, that the time for Defendant to file its  
20 reply to Plaintiff's Opposition to Motion to Dismiss (ECF No. 34) may be extended one additional  
21 week, to January 19, 2021, and that Defendant may exceed the page limitation for the reply by up  
22 to ten (10) pages. The parties agree and respectfully submit that good cause exists for this  
23 stipulation based on the following:

24 1. Defendant filed its Motion to Dismiss Complaint on November 6, 2020. (ECF No.  
25 21).

26 2. The parties thereafter stipulated to provide Plaintiff with a four-week extension to  
27 respond to the Motion to Dismiss. (ECF No. 28).

1           3.       The parties thereafter stipulated to (1) permit Plaintiff to exceed the 24-page  
2 limitation in its Opposition by up to 20 pages; and (2) accordingly extend the time for Defendant  
3 to file its reply to Plaintiff's Opposition by two weeks (or until January 11, 2021). (ECF No. 33).

4           4.       The Court has issued orders permitting (1) Defendant to exceed the general page-  
5 limitation for its Motion by three (3) pages (ECF No. 35); and (2) Plaintiff to exceed the page  
6 limitation for its Opposition by twenty (20) pages (ECF No. 32). In granting these motions, the  
7 Court has agreed with the parties that the breadth of the issues involved in this action warrant an  
8 exception to the general 24-page limit. (ECF No. 32 at 1:24-25; ECF No. 35).

9           5.       Plaintiff's filed Opposition is 43 pages. (ECF No. 34). As with the Motion and the  
10 Opposition, good cause exists for Defendant's request to exceed the general page limit for replies  
11 (12 pages) because the issues raised in Defendant's Motion and Plaintiff's Opposition implicate  
12 important issues of law arising from the COVID-19 pandemic and related insurance coverage  
13 issues, most of which have not been addressed or decided by the Ninth Circuit, this Court or the  
14 Nevada appellate courts.

15           6.       Good cause also exists to permit a one-week extension for the filing of Defendants'  
16 reply to the Opposition. Defendant agreed to provide Plaintiff with a four-week extension, to  
17 December 21, 2020, to file its Opposition. (ECF No. 28). Defendant also stipulated to allow  
18 Plaintiff to exceed the general page limitation in the Opposition by twenty pages. Plaintiff  
19 accordingly agreed to an initial two-week extension, to January 11, 2021, for Defendant to file its  
20 reply. (ECF No. 33). Defendant seeks an additional one-week extension to file its reply, or until  
21 January 19, 2021, due to the length of Plaintiff's Opposition, the breadth and complexity of the  
22 issues raised in the Opposition and the timing of the reply deadline, which has overlapped with the  
23 holidays and the year-end of 2020.

24           7.       This stipulation is made in good faith and for good cause, and not for any purpose  
25 to delay.

1           8.       The parties further agree that this stipulated extension of time does not operate as  
2 any admission or waiver of any claim or defense by Plaintiff or Defendant.

3  
4 DATED this 5<sup>th</sup> day of January, 2021.

DATED this 5<sup>th</sup> day of January, 2021.

5 KENNEDY & COUVILLIER, PLLC

LEWIS BRISBOIS BISGAARD & SMITH  
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6  
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15 **ORDER**

16 IT IS SO ORDERED.

17  
18 *James C. Mahan*  
UNITED STATES DISTRICT JUDGE

19  
20 Dated: January 8, 2021  
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